

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Corporation for National and Community Service

Follow-up to OGE Report Number: 18-50I

Report No.: 20-22IF

Date: May 14, 2020

UNITED STATES OFFICE OF
GOVERNMENT ETHICS


Preventing Conflicts of Interest
in the Executive Branch

As a result of its inspection of the Corporation for National and Community Service (CNCS) ethics program, the Office of Government Ethics (OGE) issued nine recommendations in its September 2018 inspection report. OGE conducted a follow-up review in May 2019 to assess whether CNCS had taken sufficient action to resolve the deficiencies underlying these recommendations. Follow-up fieldwork was also conducted in September 2019 to gather additional, updated information regarding the financial disclosure program. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that new entrant confidential financial disclosure reports are filed timely as required by 5 C.F.R. § 2634.903(b).	<p>During the follow-up review conducted in May 2019, OGE selected a judgmental sample of 20 new entrant confidential financial disclosure reports that were required to be filed by new CNCS employees in 2018. Seventy-five percent of the new entrant confidential reports OGE examined were filed timely.</p> <p>Follow-up fieldwork was conducted in September 2019 to gather additional, updated information regarding the confidential financial disclosure program. During this review, OGE sampled 14 new entrant confidential reports that were filed in 2019. Seventy-nine percent of the new entrant confidential reports OGE examined were filed timely.</p> <p>Timeliness in filing has improved slightly from our September 2018 inspection. At that time, 73% of the confidential reports OGE examined were filed timely. OGE will keep this recommendation open for additional follow-up.</p>	Open

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2	Ensure that new entrant confidential financial disclosure reports are reviewed and certified within 60 days of receipt as required by 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	<p>Of the 20 new entrant confidential reports that were selected for examination in May 2019, 45% were certified within 60 days of receipt.</p> <p>Follow-up fieldwork conducted in September 2019 revealed that 43% of the 14 new entrant confidential reports OGE examined had been certified within 60 days of receipt.</p> <p>OGE will perform a second follow-up review to determine whether CNCS improves.</p>	Open
3	Establish written procedures for issuing notices to prospective employees as required by 5 C.F.R. § 2638.303(c).	CNCS drafted written procedures for issuing notices to prospective employees and provided the draft policy to OGE. The draft procedures met applicable requirements.	Closed
4	Establish written procedures for supervisory ethics notices as required by 5 C.F.R. § 2638.306(d).	CNCS drafted written procedures for issuing supervisory ethics notices and provided the draft policy to OGE. The draft procedures met applicable requirements.	Closed
5	Established written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f).	CNCS drafted written procedures for providing initial ethics training and provided the draft policy to OGE. The draft procedures met applicable requirements.	Closed
6	Ensure that new employees receive initial ethics training within three months of their appointment as required by 5 C.F.R. § 2638.304(b).	OGE determined that CNCS had 133 new employees who were required to receive initial ethics training in 2018. According to training records provided to OGE, 126 (95%) of the 133 new employees received the required training within the required timeframe.	Closed
7	Ensure that all contracting officers described in 41 U.S.C. § 2101 receive annual ethics training, as required by 5 C.F.R. § 2638.307(a)(3).	Seven contracting officers at CNCS were required to receive annual ethics training in 2018. According to information provided to OGE during the follow-up review, five of the seven officers were trained by the end of 2018. The remaining two officers departed CNCS before training was conducted.	Closed

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8	Ensure that confidential reports filed by SGE committee members are reviewed timely and certified within 60 days of receipt, unless additional information is being sought or remedial action is being taken, as required by 5 C.F.R. § 2634.605(a).	According to ethics officials, the CNCS Board of Directors was the only advisory committee that met in 2018. OGE determined that the confidential reports filed by all four Board members were certified within 60 days of receipt. OGE also determined that all four reports were reviewed before the SGEs attended their first meeting.	Closed
9	Ensure that SGE committee members are initially trained when they come on board and annually thereafter as required by 5 C.F.R. §§ 2638.304 and 2638.307.	OGE determined that all four CNCS Board members were provided live ethics training in 2018. The training was conducted prior to the SGEs attending their first meeting.	Closed

Based on the results of OGE’s follow-up review, all recommendations except for recommendations 1 and 2 are closed. OGE will conduct a second follow-up review to assess whether the remaining recommendations can be closed.